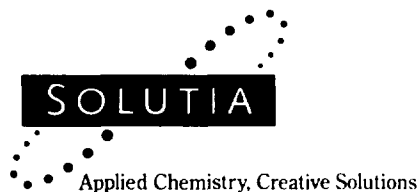


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Solutia Inc.
575 Maryville Centre Drive
St. Louis, Missouri 63141

P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel/ 314-674-1000

October 15, 2001

Mr. Michael Ribordy
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **October 2001 Monthly Report**

Dear Mr. Ribordy,

Enclosed is the October 2001 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "D. M. Light", is written over the typed name.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

K. Turner - USEPA
T. Gouger - USACE
S. Bron - IEPA
Sauget File - Solutia
Village of Sauget - % P. H. Weis & Associates (Attn: Brian Nelson)
Kevin de la Bruere - USF&W
Michael L. Henry - IDNR
Tom Long - Cahokia Consultant (% Sapphire Group)
Dave Webb - IDPH
Mayor Dee Reed - Cahokia, IL
Mayor P. Sauget - Sauget, IL

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: October 15, 2001
Period Covered: September 1, 2001 – September 30, 2001
Next Report Period: October 1, 2001 - October 31, 2001

Work Performed during the reporting period

Background

The Sauget Area I consolidated draft EE/CA & RI/FS Report was submitted to the Agencies for review and comment on March 9, 2001. The Agencies responded to Solutia with comments on April 12, 2001. Solutia met with the Agencies at the Sauget Village Hall on May 23, 2001 to discuss Solutia's Responses to the Agencies' comments. Revision 01 Draft EE/CA & RI/FS Report was submitted to the Agencies June 8, 2001. The Agencies responded to Revision 01 Draft EE/CA & RI/FS Report on July 17, 2001 requiring additional revisions before approval.

Results

Agreement was reached in an August 3, 2001 meeting that the Agencies would further modify and revise Revision 01 Draft EE/CA & RI/FS Report and return to Solutia for completion and final issuance. During September, the Draft EE/CA & RI/FS Report remained under review by the Agencies.

Revision 2 of the Draft HHRA - submitted to the Agencies August 31, 2001 – and a revised Draft Ecological Risk Assessment ("ERA") submitted to the Agencies June 29, 2001 remained under review.

There are no Technical Memos attached to this report.

Data Submittal

There is no data submitted in this report.

Work scheduled for next reporting period

Receive and respond to Agencies' modifications to Revision 01 Draft EE/CA & RI/FS Report. Make required revisions to the draft ERA and HHRA.

Problems and Solutions

NONE

Submittal Schedule Status

See attached schedule - consistent with the approved SSP - as revised where indicated.

Other Issues

None

Comments:

None

January 21, 1999 Sauget Area I AOC
SCHEDULE

(03/01 Revision)

- | | |
|--|---|
| 1. Designation of Contractor | Completed 3/10/99 ¹ |
| 2. Designation of Other Contractors | 5 Business Days Before Start of Work |
| 3. Designation of Project Coordinator | Completed |
| 4. Submit Support Sampling Plan (SSP) | Submitted February 22, 1999 |
| 5. Submit Revised SSP | April 8, 1999 ² June 25, 1999 ³ August 13, 1999 ⁴ October 9, 1999⁵ Approval |
| 6. Obtain Access Agreements | July 1, 1999 ⁶ October 17, 1999 ⁷ October 1, 1999 ⁸ |
| 7. Submit Health and Safety Plan (HASP) | Approved October 9, 1999 |
| 8. Submit Quality Assurance and Sampling Plan (QAPP) | Approved October 9, 1999 |

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ June 25th SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

⁵ August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

⁶ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

⁷ Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

⁸ Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)

(03/01)

- | | |
|---------------------------------------|--|
| 9. Sampling Notification | 10 Business Days Prior to Start of Work ⁹ |
| 10. Submit Data Report ¹⁰ | 01/09/01¹¹ (Submitted 1/9/01-) Included HH & Eco R/As) |
| 11. Submit EE/CA Report ¹² | 60 Calendar Days After Data Report Submittal - 03/09/01 (Submitted 3/9/01) March 30, 2001 ¹³ (Submitted 3/30) |
| • Revised HH and ECO R/As | |
| 12. Submit Revised EE/CA Report | 21 Calendar Days After Receipt of EPA Comments Revised Report Submittal – 06-08-01 (Submitted 6/8/01) |
| 13. Submit RI/FS Report | 90 Calendar Days After Data Report Submittal - 04/09/01 (Submitted 3/9/01 w/ EECA Report) |

⁹ Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

¹⁰ The January 9, 2001 Data Report submittal also included the draft Human Health and ECO Risk Assessments.

¹¹ Per SSP - 16 mo. from SSP approval date of 9/9/99.

¹² The March 9 EECA submittal also included the RIFS.

¹³ The Agencies formally commented on the January 9, 2001 Draft Human Health and Ecological Risk Assessments and discussed them in a February 21 meeting and required submittal of revised Risk Assessments March 30, 2001.

14. Submit Revised EE/CA & RI/FS Report

21 Calendar Days After Receipt of
EPA Comments (**Submitted March
30, 2001**)

Revised Report Submittal – **06-08-01
(Submitted 6/8/01)**

Revised Report Submittal – 08-10-01
**(Agreement reached in 08-03-01
meeting – Agency to prepare next
draft prior to Solutia's completion)**

15. Progress Reports

Monthly Beginning February 19,
1999¹⁴

¹⁴ Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10th of the month.